

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Isabella Tanikumi
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Plaintiff, Pro se

Isabella Tanikumi AKA
L. Amy Gonzalez

Plaintiff,

vs.

The Walt Disney Company, Disney
Enterprises, Inc., Disney Worldwide
Services, Inc. and ABC Corp. 1-10
(a fictitious name)

:
: UNITED STATES DISTRICT COURT
: FOR THE DISTRICT OF NEW JERSEY
:

: CASE NO:
:

: COMPLAINT
:
:

Plaintiff, Amy Gonzalez t/a Isabella Tanikumi, by the way of Complaint
against defendant, The Walt Disney Company and its subsidiaries does herein state;

FIRST COUNT

1. The Plaintiff has standing to sue as she is the current owner of record of the works that are the subject of copyright infringement, fraud and plagiarism, titled "Living My Truth" copyrighted in December 2010, and Yearnings of the Heart", 1st Edition 2010 and 2nd Edition 2013 respectively. Copyright applications have been filed and perfected, for "Living My Truth" registration date January 2011 as TXul1-744-679 (filed December 23, 2010) and reprinted as "Yearnings of the Heart", collectively referred to as "Plaintiff's Work" (Exhibits A and B).

2. This action arises under Section 1338 of the Judicial Code and under 17 USC Sections 501 through 505 for copyright infringement.
3. Defendants Disney Corporation (hereinafter "Disney") and Buena Vista Home Entertainment, Inc. (hereinafter "Buena Vista") did infringe Plaintiff's copyrights, and, through its employees, agents and subcontractors, plagiarize and copy the story, characters, plots, subplots and storyline from Plaintiff's Works to create the story and movie "FROZEN". As a result, Defendants have caused Plaintiff irreparable harm. Examples of specifics showing substantial similarities are attached hereto as Exhibit A.

Wherefore, Plaintiff seeks Judgment against the Defendants for a restraining order to cease and desist from any and all sales, distribution and marketing of FROZEN in any media format, as well as money damages in the amount of \$ 250,000,000.00, together with costs of suit, and such other relief as the Court may deem appropriate.

SECOND COUNT

1. The Plaintiff has standing to sue as she is the current owner of record of the works that are the subject of copyright infringement, fraud and plagiarism, titled "Living My Truth" copyrighted in December, 2010, and "Yearnings of the Heart", 1st Edition 2010 and 2nd Edition 2013, respectively. Copyright applications on both works have been filed and perfected, for "Living My Truth" registration date January 10, 2011 TXu1-744-679 (filed December 23, 2010) and reprinted as "Yearnings of the Heart" (collectively "Plaintiff's Work").
2. This action arises under Section 1338 of the Judicial Code and under 17 USC Sections 501 through 505 for copyright infringement.
3. Defendants Disney Corporation (hereinafter "Disney") and Buena Vista Home Entertainment, Inc. (hereinafter "Buena Vista") did, through its employees, agents and subcontractors, plagiarize and copy the concept, feeling, story, characters, plots, subplots and storyline from Plaintiff's Works to create the story and movie "FROZEN", fraudulently represent that FROZEN was its own creation, further in violation of applicable laws. As a result, Defendants have caused Plaintiff irreparable harm. On July 22, 2014, Plaintiff served upon Defendants Notice to cease and desist using her work product and defendant responded by expanding its exploitation of her work marking to international audiences, as well as many off shoot project such as live plays, games, toys, and costumes.

Wherefore, Plaintiff seeks Judgment against the Defendants for a restraining order to cease and desist from any and all sales, distribution and marketing of FROZEN in any media format, as well as money damages in the amount of \$ 250,000,000.00, together with costs of suit, and such other relief as the Court may deem appropriate.

PUNITIVE DAMAGES

Plaintiff requests that the Court recognize the intentional and serious nature of Defendants' wrongdoings herein and additionally grant Plaintiff relief in the form of punitive damages.

DEMAND FOR JURY TRIAL

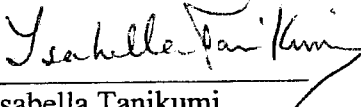
Plaintiff hereby demands trial by jury as to all issues in the above matter.

CERTIFICATION OF NO OTHER ACTION

The Plaintiff certifies that there are no other cases pending or that have been filed in any court or are the subject of arbitration or mediation pertaining to the subject matter of this Complaint. The Plaintiff further certifies that there is no knowledge of any future contemplated action in any court or the subject of any future arbitration or mediation pertaining to the subject matter of this Complaint. The Plaintiff further certifies that she is not aware of any other parties who should be joined in this action.

STATEMENT OF JURISDICTION

I am a citizen of the State of New Jersey. The Defendants are corporations with their principle place of business in California. The amount of controversy, without interest and costs, exceeds the sum or value specified by 28 U.S.C. ss 1332. I certify that the above statements are true. I understand that if the above statements made by me are willfully false, I am subject to punishment.


Isabella Tanikumi
Plaintiff – Pro se

9/21/14
Date